



1038473787

IN THE DISTRICT COURT OF OKLAHOMA
STATE OF OKLAHOMAFILED IN
OKLAHOMA COUNTY
OKLAHOMA COUNTY

TIFFANIE MCGALLIARD,

OCT 24 2017

RICK WARREN
COURT CLERK
36

Plaintiff,

vs.

COMTECH DESIGN, PRINT
& MAIL, LLC, a domestic
limited liability company,

Defendant.

CJ-2017-6115

Case No. CJ-2017-

PETITION

Plaintiffs, Tiffanie McGalliard, brings this cause of action against Comtech Design, Print & Mail, LLC ("Comtech") and states as follows:

Nature of Action & Introduction

1. Plaintiff files this action seeking damages for Defendant's unlawful termination of Plaintiff's employment and wrongful treatment of her during her time of employment.
2. Defendants based its decision to terminate Plaintiff's employment on Plaintiff's sex, and in retaliation to Plaintiff's complaints of sexual harassment.

Jurisdiction and Venue

3. All of the claims herein arose in Oklahoma County, Oklahoma.
4. Defendant conducts business in Oklahoma County, Oklahoma.
5. Defendant may be served in Oklahoma County, Oklahoma.

Facts

6. Defendant hired Plaintiff as a Bookkeeper on or about February 23, 2016.
7. Defendant's Chief Financial Officer Ron Franklin subjected Plaintiff to unwanted comments and actions regarding her appearance because of her sex, which include staring at her breasts. In addition, Franklin made many remarks about his sexual experiences and other sexual acts. These comments and remarks occurred as recent as July 2016.
8. Plaintiff reported the comments and remarks to Human Relations on multiple occasions, including in July 2016.
9. On or about July 18, 2016, Plaintiff was terminated because of her complaints of sexual harassment.
10. Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission and received a Notice of Right to Sue. The Notice of Right to Sue is dated July 26, 2017. This lawsuit is filed within 90 days of the receipt of the Notice of Right to Sue.

Relief Requested

11. Defendant must pay Plaintiff all lost earnings, past and future. This amount has not been calculated as of this date. Plaintiff anticipates hiring an economist for proper calculation of this element of damages.

12. Defendant must pay compensatory damages including, but not limited to, pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses, which amounts to the statutory maximum of \$300,000.00.
13. Defendant's actions were willful, wanton, or, at the least, in reckless disregard of Plaintiff's rights; therefore, Plaintiff is entitled to punitive damages.
14. Defendant must pay Plaintiff her attorneys' fees, costs, and all other relief Plaintiff is entitled to because of Defendant's actions. This amount has yet to be fully determined and increases as the case progresses.

Demand for a Jury Trial

15. The Plaintiff demands a jury trial for all issues of fact presented by this action.

Respectfully submitted,



D. Colby Addison, OBA #32718

LAIRD HAMMONS LAIRD, PLLC

1332 SW 89th Street

Oklahoma City, OK 73159

Telephone: 405.703.4567

Facsimile: 405.703.4067

E-mail: colby@lhllaw.com

ATTORNEYS FOR PLAINTIFF

ATTORNEY LIEN CLAIMED